

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**4 : CV - 22 - 1761**Justin I. Stackhouse

CIVIL CASE NO: _____

(to be supplied by Clerk
of the District Court)(Enter above the full name of
plaintiff in this action)

v.

St. Joseph institute for
addiction+ let to be named conspirators
(Enter above the full name of
the defendant(s) in this action)**FILED
SCRANTON**

NOV 04 2022

PER SP
DEPUTY CLERKCOMPLAINT

1. The plaintiff Justin I. Stackhouse a citizen of
the County of Butler State of
Pennsylvania, residing at 202 S. Washington St Butler PA 16001
wishes to file a complaint under 28 U.S.C. CIVIL TORT
(give Title No. etc.)

2. The defendant is located at 134 Jacobs way, port matilda, PA. 16870
conspirators addresses unknown, names unknown, filing suit in professional capacity
for St. Joseph institute for addiction and professional and individual for conspirators

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper exhibits that give further information of your case, attach them to this completed form. Use as much space as you need. Attach extra sheet(s) if necessary) _____

~~X (CONTINUED)~~ BCP Has prevented Miss Steckhouse from making copies or obtaining legal material for her law suit she has done the best she can with what she has got, even down to the homemade envelop. She prays that that court will assist her in the filing of this complaint and see fit to send paper work to her to show BCP that she is a pro se filer, permitting them to allow her access to legal material. OK now they claim they can not provide me with ANYTHING even if you tell them I'm pro se. IDK what to do, I'm being denied access to the

Following is MY claim.
courts because I have no money

~~X~~ WHEREFORE, plaintiff prays that

(Signature of Plaintiff)

UNITED STATES DISTRICT COURT

for the
Middle District of Pennsylvania
CIVIL Division

Justin T. Stackhouse
JUSTIN T. STACKHOUSE

Case No.

Case No.

St. Joseph Institute For
ADDICTION

and

Yet to be named conspirators

THIS IS A
COMPLAINT For VIOLATION of EQUAL RIGHTS

I JURISDICTION and VENUE

1. This is a civil action authorized by 42 U.S.C. section 1981 (a)(b)(c).
for deprivation of rights secured by the Constitution of these United States. This court
has Jurisdiction under 28 USC. Section 1331 and 1391 (b)(1) & (d). Plaintiff
Justin T. Stackhouse seeks declaratory pursuant to 28 U.S.C. section 2201
and 2202. Plaintiff's claims for Damages will include compensatory and punitive
damages.

2. The middle district of Pennsylvania is an appropriate venue under 28
USC. Section 1331 (1)(d). Because this is were the events transpired. And under
28 U.S.C. Section 501 (b) or 16 U.S.C. 457

III DEFENDANTS

1. Defendant(s) St. Joseph Institute for addiction and as of yet to be named Accomplice(s) is and are at all times mentioned responsible for any and all actions or inactions carried out with regards to this claim.

IV STATEMENT OF FACTS

5. Plaintiff, herein after referred to as Miss Stackhouse or Stackhouse, Arrived at St. Joseph's Institute for addiction some time in MAY of 2022. Stackhouse was not court ordered to participate in this Rehabi program.

6. After being tagged with a tracking device, Stackhouse was given three days to get use to the compound. Miss Stackhouse suffers from G.D (Gender Dysphoria) along with more mental health issues and underlying addiction issues.

7. Miss Stackhouse was denied proper medical treatment and denied the continuity of medication. Upon arrival to St. Joseph's.

8. Miss Stackhouse was unable to handle the rehabilitation process and attempted to sign out AMA "against medical advice" not only because of her hormone withdrawal symptoms but the safety of her wellbeing was at risk.

9. Miss Stackhouse was then held against her will when she signed the above mentioned AMA and revoked the consents given to St. Joseph's. This went on for no shorter amount of time than 12 days. Consents were only given in Terrorem once revoked.

10. Miss Stockhouse was denied food pending participation in group activity for no less than 3 days.

11. Miss Stockhouse was forced into giving Medical consent to treatment. Medical then reinstated all consents which was not Stockhouse's intentions.

12. Miss Stockhouse was then threatened by a Resident/client with physical harm to her person, which was later followed up by actual action, at a later time given rise to the action at issue.

13. Miss Stockhouse was assaulted by same said client. At which point after giving staff ample opportunity to address this issue, Police were called.

14. The Police involved in this action made no reports, asked for no names.

EVENT TIMELINE

15. Miss Stackhouse is a 42 year old Transfemale pre-op with underling mental health and addiction issues. Miss Stackhouse was abused, held hostage and denied due process of the law. Miss Stackhouse was attending TOP treatment for drug use at the care center in Butler PA, through the months of Feb-April of 2022. Stackhouse informed her one-on-one therapist that she may require a higher level of care namely a rehab. This rehab is at the epicenter of this law suit. IN the begining of May of 2022 a representative for St. Joseph's instatute for addiction picked me up. Upon arrival I felt like I was in another world. Once I was strip searched, processed and tagged with a tracking device, it kinda took on a jail feel.
16. Stackhouse was given 3 days to get use to th compound. Stackhouse came in on HRT medication. Getting meds back on track was another reason for rehab. The on site Doctor said "I don't feel comfortable giving them to you." The fact that she was on them was verified through central outreach and the blood test taken my last week there confirmed I was. Currently still taking them. Hormone withdrawal is not a fun ride coupled with her own drug use had made them even worse.
17. The next issue arises upon the arrival of Brandy, or at least it is belived that this is her name. Do to HIPPA she really could have had any name. This person is also the individual that later assaults miss Stackhouse. "Brandy" told miss Stackhouses' roommate that she feared for her safety because she was placed in the room with miss Stackhouse, or in her words "A grown ass man in girls clothes". Stackhouse first told Kitchen staff about this incident first thing in the morning, seeking guidance as to what to do next from those I was in the care of. The fact that the roommate provided almost never slept the whole night in the room, only added to the anxiety and fears being experianced by Miss Stackhouse. After explaining this situation to Kitchen staff and expressing her concerns she was directed to speak to housekeeper Rusty, and another staff member to help resolve this issue. Stackhouse was informed by staff that the provided roommate would be removed or replaced. Four more days passed with no action taken place on either the meds nor Miss Stackhouses'

concerns about the issues now surrounding her roommate. If nothing else it just looked as though there was a problem, with her not spending nights in the room. She was young, very impressable and giving Stackhouse's life experiences this just did not look good at all.

18. In any event nothing was ever done about this. Next, stackhouse spoke with her counselor Rusty and had come to the decision that the best course of action was to just remain herself, find another rehab and start over. Stackhouse signed her AMA (Against medical advice) papers so she could leave, and at that revoked all consents previously given. Needless to say this did not go over very well with administration. Threats issued. First was issues over insurance billing, which would now be assumed to Stackhouse as a private matter. Miss Stackhouse was then informed that she was now a trespasser on private property. She was still refused her property. Miss Stackhouse was picked up and brought to this establishment at no less than 3 hours from home. She was refused her ID, monies, and any form of communication and located in the middle of the woods. She was also told by Rusty that because of these revoked consents he could not even verify that she was ever there. Terrified is not even a word that comes close to the fear & shock she is under at this point.

19. Next, given the events up to this point and the revoked consents miss Stackhouse was grateful that the cops were not called to arrest her for trespass. Being that she had signed an AMA and told that she could not have her property for 3 days and that she would be personally liable for payment lacking insurance, she did not come out of her room for 2 of those days until hunger got the best of her. At first the kitchen staff made her 1 meal. After this they (kitchen staff) were informed "not to prepare her food, if she wanted to eat she will just have to eat with the group". Even her next door neighbor and roommate was pulled down to make sure they were not bring food to there hostage. This food ban on stackhouse plays out once again before her departure. Seeing the kitchen staff crying over her safety and worrying about her eating was a travesty in and of its self. Miss Stackhouse then spoke to the Point of Contact for Crisis Cook Center of Excellence in Butler, the person who got

Miss Stackhouse into this rehab in the first place. She inform Miss Stackhouse that given the recent revocation of her consents that this POC could not speak to Chris Cook in her behalf and talks of reinstatement of consents ensued. At this point the only consent agreed to was for medical. Medical then reinstated all consents on the blanket policy that "as long as the signature had not changed any information no re-signing was necessary and all signatures could be restored with just one click". Which is what they did. I was only giving consent to medical in order to get lab work for my HRT levels. Come to find out by and through kitchen staff one of the prerequisites for employment there is they must be ok with "mandatory group areas of treatment", the 3 day AMA being just one of them.

20. Since the issue with Rusty, the counselor assigned to Miss Stackhouse, AMA and all, she was assigned a new counselor Kathy, assumingly. Name are kind of not as important as the events at this point. At the counselor group meeting "small group" Miss Stackhouse was verbally assaulted by Brandy and threatened with future bodily harm because she shushed her during a meeting. Miss Stackhouse was not the only person to do but Brandy made it very clear to the other girl that Miss Stackhouse was the object of her out rage. At the garden outside during smoketreak the issue over the incident that had just transpired was brought up. Her response was "I'll just have my boyfriend 'MATT' beat you up". In Miss Stackhouse's mind, she is trapped with no where to go, no way to get there, and no contact information to even attempt to have someone she knows rescue her, and now the girl that started this whole Roommate, AMA issue is making threats.

21. Following this issue the next group was cut short instead of being let go since there were only 7 or 8 of us. Bradley "group instructor" asked if anyone had any songs or music videos they wanted to play. Brandy gets Bradley to play "Take me to church" which is a homophobic video about a gay man being drug out into the woods to be left alive. Followed by a country song about being a "Real" woman. Miss Stackhouse informs her next door neighbor Alexie or Alexis as to what is going on and why

She was crying. After running to her room she did not come back out until later that day or the next. The timeline is a little fuzzy but don't forget Stackhouse is at all times tracked, so the logs will have the required metadata. She again seeks counsel of Kitchen staff, then is directed to monitor staff, this staff member was filled in on all of the events and she was told to try and work it out, and how newly recovering addicts tend to do this or that.

22. Miss Stackhouse expressed her concerns over the growing issues surrounding this client, to no avail. So Stackhouse once again shut herself out of participation in group activities and this time it was 3 or 4 days later before she had no choice but to go back out to eat. The sounds of the Golf driving bye every hour so that staff could "tag" me became terrifying. Considering the events that have transpired up to this point she just did not think she was ever going to see home again.

By now the lack of Medication on top of the issues previously mentioned the withdrawal from hormones is causing emotional stress that really can't even be defined by any type of explanation. Miss Stackhouse was then informed to just try and work it out.

23. With that in mind Miss Stackhouse approached Brandy's boyfriend Matt, told him to bring her to the gazebo out side of Medical so as to try and sort things out. By this point she had already sent one individual to bully Miss Stackhouse and the relationship did not seem to be going in a positive direction at all but increasing into the negative direction. The conversation went on for 10 minutes at which point Brandy looked over to Matt her boyfriend and asked why he was not doing anything to me. Matt then explained that he was not going to get involved. Brandy then stood up put her hand around Miss Stackhouse's throat and told her "You just a full ass dude in girls clothes" and to get over herself and deal with it like a man. Stackhouse took off for her room with one option, press charges. This all happen at night, around 9:00pm.

24. So that night Miss Stackhouse lay in front of her room door. Miss Stackhouse is or was unsure as to who this Brandy was having relations with, so once again she is unable to even go to the canteen, to eat. Once again Miss Stackhouse was in fear for her life, safe, and freedom and the staff would still let nothing be brought to her.

So Miss Stackhouse waits until Womens hour the following day because she knew were all the women would be. She went to her counselor to explain what was going on. Word was sent to her by staff that stackhouse was outside and had been assaulted. Stackhouse sat on a rock in the driveway for almost 45 minutes. Knowing that womens hour will be coming to a close very shortly she opted to head back to her Room/cell. Miss Stackhouse's counselor showed up about 30-45 minutes after that. This went on for another 24 hours, "while staff figured things out". Stackhouse was give paper work to fill out, given how bad her hand writing and spelling is she had Lexie the girl next door fill it out for her, as she was prever to most of these events. stackhouse had also admitted her thoughts of suicide to this person.

25. Getting to the larger aspect of this issue. up until this point the lower level administration has been given ample opportunity to deal with this in some way. They were even given another day to deal with the assault. They admittedly told Miss Stackhouse that they never checked camras. At this point Miss Stackhouse has no other options but to survive this or call the Police. Calling the Police seemed the right thing to do. Miss Stackhouse's next steps were to go to Administration with these issues. Every attempt was made to prevent her not only from calling the Police but to even be present at administrations building. Needless to say Miss Stackhouse did not leave and made her case known and also her desire to involve authorities in this matter. After some time Administration then informed Miss stackhouse that she was to wait out in the lobby so Administration could find the phone number to the Police, to which miss Stackhouse said "911". She was told that this was not an emergency. At this point Miss Stackhouse went to the lobby waited about 5 - 10 minutes at which time she was told to come back into the office.

26. Miss Stackhouse spoke to a dispatcher explaining her need for assistance, to which she was informed a uniformed police man would arrive in a couple of hours. Miss Stackhouse was walked back down to her room at some point during the walk

Brandy came at her at which point Miss Stackhouse was about run into the drainage ditch trying to get away from her. The staff member walking Miss Stackhouse back to her room was also consumed demoralized by her outstretched arms.

27. Some time later, like 4 hours the police arrived. They were not allowed on the property so Miss Stackhouse was escorted to the gates at the top of the hill. Officer Clark asked her, her name, address and his pen went right back into his pocket. So at this point Miss Stackhouse knew that this was a sham and only for show. Miss Stackhouse had intentionally left things out of her line of events, just about the assault. Again as a test to the theory of being a sham, what was left out was the witnesses and the assailant's Name. Before Miss Stackhouse left and after Officer Clark said that there was nothing he could do, Miss Stackhouse asked why he never asked about the attacker's name and if there were witnesses to these facts.

A. VIOLATION OF AMENDMENTS VIII & XIV Section 1 OF THE BILL OF RIGHTS AND RIGHTS OF THE U.S. CONSTITUTION

28. The legal arguments that pertain to this case/claim are many and the facts claimed are done by no less than 5 defendants in their individual and professional capacity. The problem now facing Miss Stackhouse is the nature of the sensitivity of information she will need to continue on with her case. Miss Stackhouse was so shocked and hurt by these events that she was unable to even go back to work and function properly. Miss Stackhouse attempted suicide upon arrival home and has still not recovered from this ordeal and truly believes that the only safe place for her is Jail, she was not and as demonstrate, is not ever going to be treated with fairness or accorded the same rights that others have. This is her belief and outlook on life right now.

29. Given the facts of this case it is hard to discern every wrong that happen to Miss Stackhouse but we will step through each paragraph and state the claim as best as possible. at 16. Medical malpractice. Not only was Miss Stackhouse Denied medical necessary treatment, the statement by the doctor "I just don't feel comfortable starting you on that" was based not on a professional but personal preference. This is said because not only the way it was stated to Miss Stackhouse but also given her profession as a doctor, she should have known the adverse side effects that follow HRT Withdrawal.

30. Medical Malpractice can be broadly defined as the unwarranted departure from generally accepted standards of medical services. See Hodgson v. Bigelow 335 Pa. 497, 7 A.2d 338 (1939). Plaintiff must "establish a duty owed by the Physician to the Patient, a breach of that duty by the Physician, that the breach was the proximate cause of the harm suffered, and the damages suffered were a direct result of the harm." Hightower v. Warren 698 A.2d at 59 saying that these actions arose from want of care follows the same line of reasoning relied upon in the Medical Malpractice claim of Toogood v. Bagal

824 A.2d 1140 (Pa 2003). The Eighth Amendment's deliberate indifference standard in Farmer v. Brennan 511 U.S. 825, 836 (1994) with deliberate indifference lying somewhere between the poles of negligence at one end and purpose or knowledge at the other, the courts of Appeals have routinely equated deliberate indifference with recklessness see La Marca v. Turner 995 F.2d 1526, 1535 (CA11 1993); Manarite v. Springfield 957 F.2d 953, 957 (CA2 1992), stating that it's far to say acting or failing to act to a substantial risk of harm is equated to recklessly disregarding that risk.

Res Ipsa Loquitur

There must be reasonable evidence of negligence. But where the thing is shown to be under the management of the defendant or his servants, and the accident is such as in the ordinary course of things does not happen if those who have the management use proper care, it affords reasonable evidence, in the absence of explanation by the defendants that the accident arose from want of care.

31. Miss Stackhouse's Denial of medically NECESSARY treatment put her at a substantial risk of not only current but future serious harm, by the physical and psychological side effects of untreated GD (Gender dysphoria) and hormone withdrawal. See generally Edmo v. Corizon, Inc 935 F.3d 757 (9th Cir 2019), Johnson v. Kruse No. 17-cv-237. JPG, Brown v. Zavaras, 603 F.3d 967 (10th Cir 1995). The serious lack of even moral standards of care in this matter is astounding. Even understanding the time frame to properly treat or continue to treat a patient may take a few days to a week. To receive NO treatment in just under a month is unheard of, especially in light of the fact that confirmation was given as to the medication prescribed.

32. Medical Negligence, being some other type of harm a doctor can inflict upon a person is not as sticky as malpractice, Proving breach of duty is not difficult in this case giving the facts surrounding the issue over medical treatment.

33. Paragraph 18 Fall readily within the confines of false imprisonment. When Miss Stackhouse signed her AMA her belongings should not have been used (money, ID, phone, clothes) as a way to retain her residence at what now became prison. Miss Stackhouse was over 3 hours away from home, in the middle of the woods. What was she to do, live off berries in the woods for 3 days until such time as her money, ID, phone was released. Staff are aware of this "Morally Gray Area" and if it's not a written policy they act as though it is. It really is standard operating procedure for them and AMA.

34. Under 18 USC § 1201 (a) AKA: The Kidnapping Statute, it's required inter alia that the victim be (1) held against his/her will (2) for some benefit to the captor. See United States v. Gabaldon 389 F.3d 1090, 1094. Under any expression of business operated in these United States, the people determine who they want to do business with, and at all times retain the power to terminate that business, contracts permitting. At no time is a citizen to be forced to do business with a person or company causing them harm.

35. Given the circumstances surrounding the torts committed by defendants and the actions or inactions and departure from duties and responsibilities due to plaintiff, this can only be viewed as reckless disregard of plaintiff's rights. To satisfy prong (1) above can be clearly and plainly shown by the signing of the AMA and the revocation of all consents. Prong (2) benefit to captor was achieved by and through her insurance, which we are sure they collected during the time frame after AMA signing and the revoked consent, this we might add is against corporate law. Given the circumstances surrounding Miss Stackhouse's arrival and the issues over her insurance deductible furthering this case can only lead to more issues.

captor as defined by Bouvier Law dictionary (2012 edition). A captor of property may legally keep that seized property in accordance with the laws controlling belligerents' rights. More generally, a captor is anyone who captures

a person, which may give rise to a claim for kidnapping, False imprisonment when the capture is not done in accordance with the law of arrest,"...

36. Under the Civil Rights Act 42 USC § 1982 (7)(F) a public accommodation being a hospital or other service establishment, for the purpose of a 1983 (a)(4) Civil suit, this falls quite nicely within those same guidelines as an establishment operating "under color of state statute". Even if this court don't agree with this argument movent, still believes she is intitled to relief and any further benefits this court deems Right & Just, for redress. The defendant will try to argue that plaintiff was at all times free to leave. IN rebuttal to this plaintiff puts forth the false imprisonment claims under 18 Pa. Cons. Stat. § 2903 (a) "A person commits an offense if he knowingly restrains another unlawfully so as to interfere substantially with his liberty."

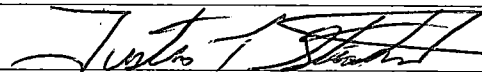
37. Discovery will most certainly require documents that are confidential, under Earle v. City of Huntington (S.D. W. Va. 2017) the documents subject to Supra are sufficiently relevant to outweigh the importance of confidentiality. at civil action No. 3:14-CV-29536. Given rise to plaintiffs request for the appointment of counsel in this case, The duties due to plaintiff are really not even indispute nor is the cause for damages affected to her by law, see Carter v. Monsanto Co 575 S.E. 2d 342, 347 & the Americans with disabilities Act (ADA) and Rehabilitation, Title 28 part V Department of Drugs and Alcohol programs of the Commonwealth.

"The Framers understood that cruel and unusual Punishment can be administered by the failure of those in charge to give heed to the impact of their actions on those within their care" Jordan v. Gardner 986 F.2d 1521, 1544 (CA 9 1993)

38. The issue over the lack of Due process by the local police has done nothing to strengthen miss Starkhous's resolve and belief in a system that offered no protection at all. see Adick v. Kress company, 398 U.S. 144, 150-52 stating the private party involved in such a conspiracy as "Private persons, jointly engaged with State officials in the prohibited

actions are acting "under color" of law for purposes of the statute, see also United States v. Price 338 U.S. 787, 794.

Were for all of the fore going reasons Justin T. Stackhouse prays that this court will grant the relief sought.

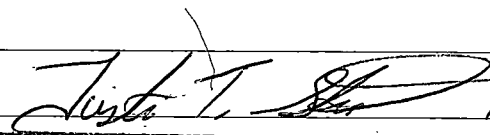

Signature

Sworn declaration

I, Justin T. Stackhouse solemnly swear that the fact in the fore going complaint are true to the best of my abilities, beliefs and knowledge. This complaint is sign in front of a notary public in accordance with state law.

She would not notifie this
for me

Notary Public Signature Date



Plaintiff Signature

10-28-2022

Date

Justin T. Shackhouse 019378
Butler County Prison
202 S. Washington St.
Butler, PA 16001

**LEGAL
MAIL**

PER *[Signature]*

NOV 04 2022

DEPUTY CLERK

[Handwritten mark]

U.S. District Court
Middle District of Pennsylvania
PO Box 1148
235 N. Washington Avenue
Scranton, PA 18501-1148

